

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

)
In Re Terrorist Attacks on September 11, 2001) No. 03 MDL 1570 (GBD/FM)
) ECF Case

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
DEFENDANT WAEL JELAIDAN'S MOTION FOR LIMITED RECONSIDERATION
OF THIS COURT'S OCTOBER 23, 2015 FEE AWARD**

1. The record herein;
2. The various decisions rendered by this Court pertaining to Defendant Wael Jelaidan;
3. The October 23, 2015 decision (docket no. 3073) by this Court awarding attorney fees to Plaintiffs;
4. The October 28, 2015 corrected version of that decision (docket no. 3087);
5. Fed. R. Civ. P. 59;
6. Fed. R. Civ. P. 1 (the Federal Rules of Civil Procedure "should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding).

Respectfully Submitted,

MARTIN F. MCMAHON & ASSOCIATES

/s/ Martin F. McMahon, Esq.

Martin F. McMahon, Esq. #196642
Martin McMahon & Associates
1150 Connecticut Ave., N.W.
Suite 900
Washington, D.C. 20036
Tel: (202) 862-4343
Fax: (202) 828-4130
mfm@martinmcmahonlaw.com

Counsel for Wael Jelaidan

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

[Counsel for Plaintiffs]

/s/ Martin McMahon

Martin F. McMahon, Esq.

McMahon & Associates

1150 Connecticut Avenue, N.W.

Suite 900

Washington, D.C. 20036

Phone: (202) 862-4343

Fax: (202) 828-4130

mm@martinmcmahonlaw.com